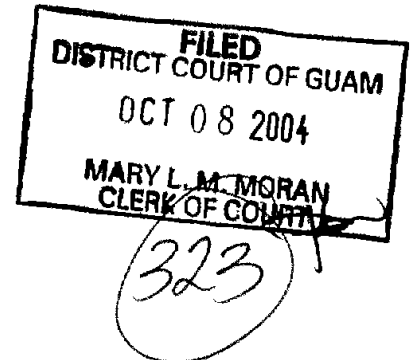


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**MOTION FOR PROTECTIVE
ORDER [FRCP 26(c)]**

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

You are hereby advised that as soon as the matter can be heard at the District Court of Guam, 520 W. Soledad Avenue, 4th Floor, Hagåtña, Guam 96910, Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will move the Court for an Order


striking the deposition notices issued by Plaintiffs to conduct the depositions in Guam of Magnus Montan and Christopher Page, as more fully explained in the Memorandum of Points and Authorities contemporaneously filed herein.

The motion will be based upon this Motion, the Memorandum of Points and Authorities filed herein, the papers, records, and files in this action, and upon such oral and documentary evidence as may be presented at the hearing of the Motion.

Dated this 24 day of October, 2004.

LAW OFFICES OF BRONZE & TANG
Attorneys for Defendant The Hongkong and Shanghai
Banking Corporation Ltd.

By:


JACQUES G. BRONZE

RAP/nsh